

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 17-10386TPA
	:	
ASHLEY PAUL CLAYPOOLE and BRYN	:	
KIRSTEN CLAYPOOLE, his wife,	:	HON. THOMAS P. AGRESTI
Debtors	:	
	:	
LAKEVIEW LOAN SERVICING, LCC,	:	CHAPTER 13
Movant,	:	
	:	RELATED TO CLAIM NO. 3
v.	:	
	:	
ASHLEY PAUL CLAYPOOLE and BRYN	:	
KIRSTEN CLAYPOOLE, his wife; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,
INC.

BY: /s/Michael S. JanJanin

Michael S. Jan Janin, Esquire

PA Id. No. 38880

2222 West Grandview Boulevard

Erie, Pennsylvania 16506-4508

Telephone: 814-833-2222, Extension 1045

Direct Dial: 814-314-1051

Facsimile: 814-833-6753

E-Mail: mjanjanin@quinnfirm.com

Counsel for Debtors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 17-10386TPA
	:	
ASHLEY PAUL CLAYPOOLE and BRYN	:	
KIRSTEN CLAYPOOLE, his wife,	:	HON. THOMAS P. AGRESTI
Debtors	:	
	:	
LAKEVIEW LOAN SERVICING, LCC,	:	CHAPTER 13
Movant,	:	
	:	RELATED TO CLAIM NO. 3
v.	:	
	:	
ASHLEY PAUL CLAYPOOLE and BRYN	:	
KIRSTEN CLAYPOOLE, his wife; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

CERTIFICATE OF SERVICE OF DECLARATION

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 14, 2017.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification via the CM/ECF System.

Ronda J. Winnecour, Esquire, Chapter 13 Trustee
cmecf@chapter13trusteedpa.com

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: November 14, 2017

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,
INC.

BY: /s/Michael S. JanJanin

Michael S. Jan Janin, Esquire
PA Id. No. 38880
2222 West Grandview Boulevard
Erie, Pennsylvania 16506-4508
Telephone: 814-833-2222, Extension 1045
Direct Dial: 814-314-1051
Facsimile: 814-833-6753
E-Mail: mjanjanin@quinnfirm.com
Counsel for Debtors